

DEBORAH S. REAMES, State Bar No. 117257  
dreames@earthjustice.org

GEORGE M. TORGUN, State Bar No. 222085  
gtorgun@earthjustice.org

Earthjustice  
426 17th Street, 5th Floor  
Oakland, CA 94612  
Telephone: (415) 217-2025  
Facsimile: (415) 217-2049

Attorneys for Plaintiffs

BRENDAN R. CUMMINGS, State Bar. No. 193952  
P.O. Box 549

Joshua Tree, CA 92252  
Telephone: (760) 366-2232  
Facsimile: (760) 366-2669

Attorney for Plaintiff Center for Biological Diversity

IGNACIA S. MORENO, Assistant Attorney General

SETH M. BARSKY, Chief

DANIEL J. POLLAK, Trial Attorney

U.S. Department of Justice

Environment and Natural Resources Division

Wildlife and Marine Resources Section

Ben Franklin Station, P.O. Box 7369

Washington, D.C. 20044-7369

(202) 305-0201 (tel)

(202) 305-0275 (fax)

Attorneys for Federal Defendants

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

CENTER FOR BIOLOGICAL DIVERSITY, *et al.*, )

Case No: C 10-01501 JCS

Plaintiffs, )

v. )

KEN SALAZAR, in his official capacity as  
Secretary of the Interior, *et al.*, )

Defendants. )

**PARTIES' STIPULATION AND  
[PROPOSED] ORDER RE: DEADLINE  
FOR MOTION FOR ATTORNEYS' FEES**

WHEREAS, in the above-captioned case:

1. A joint Stipulation of Dismissal and Order was entered by the Court on October 6, 2011 (Doc. 49).

2. In the Stipulation of Dismissal and Order, the Plaintiffs and Defendants agreed that, notwithstanding dismissal of this action, the Court retains jurisdiction to consider a further stipulation or motion concerning an award of attorneys' fees and costs. Doc. 49 at 2.

3. In the Stipulation of Dismissal and Order, the Plaintiffs and Defendants also stated that they would attempt to reach agreement as to recovery of attorneys' fees and costs and, absent such agreement, that Plaintiffs would file an application with the Court for the recovery of fees and costs within 60 days of the approval of the Order by the Court. Doc. 49 at 2.

4. On December 5, 2011, the Court granted a stipulated request by the Parties and extended the deadline for Plaintiffs to file an application for recovery of fees and costs until February 3, 2012. Doc. 51.

5. Plaintiffs and Defendants have exchanged proposals for settlement of attorneys' fees and costs, and at the staff level have reached an agreement in principle as to an amount for such settlement, pending approval by relevant officials at the Department of Justice and Department of the Interior. The Parties seek additional time to attempt to finalize this agreement without unnecessarily burdening the Court with briefing and argument on this matter.

6. Accordingly, pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs and Defendants hereby stipulate and request that the Court extend for 30 days (until March 5, 2012) the time for any motion concerning an award of attorneys' fees and costs.

DATED: January 26, 2012

Respectfully submitted,

/s/ George M. Torgun (with permission)

DEBORAH S. REAMES

GEORGE M. TORGUN

Earthjustice

426 17th Street, 5th Floor

Oakland, CA 94612

1 Tel.: (415) 217-2000  
2 Fax: (415) 217-2049  
3 dreames@earthjustice.org  
4 gtorgun@earthjustice.org

5 Attorneys for Plaintiffs

6 IGNACIA S. MORENO,  
7 Assistant Attorney General  
8 SETH M. BARSKY, Chief

9 /s/ Daniel Pollak

10 DANIEL POLLAK (Cal. Bar # 264285)  
11 Trial Attorney  
12 U.S. Department of Justice  
13 Environment & Natural Resources Division  
14 Wildlife & Marine Resources Section  
15 Ben Franklin Station  
16 P.O. Box 7369  
17 Washington, DC 20044-7369  
18 Phone: (202) 305-0201  
19 Fax: (202) 305-0275  
20 Email: daniel.pollak@usdoj.gov

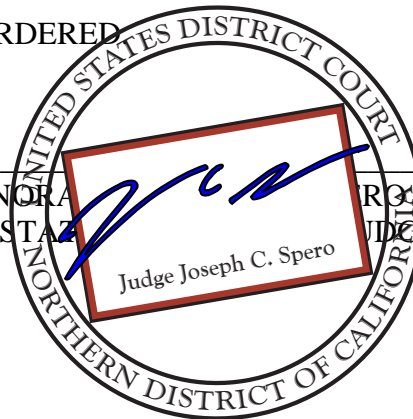
21 Attorneys for Federal Defendants  
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~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: Jan. 26, 2012

THE HONORABLE JUDGE  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA



**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of January, 2012, I caused a copy of the foregoing to be served on the counsel of record by means of the Court's electronic filing system:

Deborah S. Reames  
dreames@earthjustice.org

George M. Torgun  
gtorgun@earthjustice.org

Brendan R. Cummings  
bcummings@biologicaldiversity.org

/s/ Daniel Pollak  
DANIEL POLLAK